

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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IN RE:	:	
Angela L Cephas	:	Chapter 13
	:	Case No.: 23-13242-PMM
Debtor.	:	

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**MOTION TO RECONSIDER ORDER MODIFYING AUTOMATIC STAY**

Angela L Cephas, (the “Debtor”), hereby moves this Honorable Court to vacate its Order dated December 12, 2024, modifying the automatic stay, and in support thereof respectfully states the following:

1. The Debtor filed a voluntary petition for relief under chapter 13 of the Bankruptcy Code (the “Chapter 13 Case”) on October 27, 2023 (the “Petition Date”).
2. The Chapter 13 Case was assigned case number 23-13242.
3. The Debtor’s chapter 13 plan was confirmed by this Honorable Court on December 12, 2024.
4. On or about March 11, 2024, the Court entered an Order approving a stipulation (the “Stipulation”) between PNC Bank, National Association (the “Mortgagee”) and the Debtor resolving a motion for relief from stay. [Docket No. 35]
5. On December 05, 2024, the Mortgagee filed a certification of default asserting the Debtor was in default of the Stipulation. [Docket No. 74]
6. On December 12, 2024, the Court entered an Order granting relief from the automatic stay. [Docket No. 80]
7. On December 19, 2024, Counsel spoke with Debtor and Debtor advised that she fell delinquent due to the unexpected passing of her husband.

8. The Debtor is desirous of keeping her real property located at 69 Bartram Ave, Lansdowne, PA 19050, and to that aim will pay any and all post-petition delinquencies by or before the hearing on the instant Motion.

**WHEREFORE**, the Debtor respectfully requests this Honorable Court enters an Order vacating the Order dated December 12, 2024, modifying the automatic stay.

Respectfully submitted,

/s/ Brad J. Sadek, Esquire

Brad J. Sadek, Esquire  
Sadek Law Offices  
1500 JFK Boulevard, Suite 220  
Philadelphia, PA 19102  
(215) 545-0008  
brad@sadeklaw.com

*Counsel to the Debtor*

Dated: December 20, 2024